## Received by NSD/FARA Registration Unit 9/12/2019 12:03:00 PM

The Consulate-General of Japan in New York 299 Park Ave., 19th Fl., New York, NY 10171



AUGUST 15, 2019

## Commissioner MaryEllen Elia

New York State Education Department, 89 Washington Avenue, Albany, New York 12234

Dear Commissioner Elia,

I write in regard to recent Guidance by the Department of Education concerning the name of the Sea of Japan. As the Guidance notes, this policy decision concerns a highly sensitive diplomatic issue. Consequently, I am deeply concerned by both the content and the process of this Guidance. I urge you to issue new guidance after fully considering the range of perspectives within the community.

First of all, the Guidance is based on an incorrect understanding of historical facts. Most striking is the claim that "for more than 2,000 years, not just Koreans, but people throughout the world, viewed the body of water on the eastern boundary of Asia between Korea and Japan as the East Sea." This is completely incorrect – the name "Sea of Japan" is the only internationally established name for the body of water in question. The results of our recent surveys have confirmed that the name "Sea of Japan" has been used internationally since the 17th Century and was widely established in Europe by the end of 18th century. The name "Sea of Japan" has been overwhelmingly used around the world since the beginning of 19th century.

Second, the Department's Guidance is against the formal position taken by the United States Government. The U.S. Board on Geographic Names is a Federal body tasked with maintaining uniform geographic names. The Board has officially determined that the name "Sea of Japan" is the sole officially recognized name for this body of water.

In July, 2012, Dr. Kurt M. Campbell, then Assistant Secretary of State for East Asian and Pacific Affairs, restated this position, writing: "Concerning the body of water between the Japanese archipelago and the Korean peninsula, longstanding U.S. policy is to refer to it as the `Sea of Japan." (https://obamawhitehouse.archives.gov/blog/2012/06/29/response-we-people-petition-sea-japan-naming-issue)

In addition, the governments of other major countries, including the United Kingdom, France, Germany and China, officially use the name "Sea of Japan." In March 2004, the United Nations Secretariat also confirmed as formal UN policy that "Sea of Japan" shall be the standard geographical term, used in all official documents of the United Nations.

Third, it is unfortunate that no one in the Japanese community here in New York was informed that the Department of Education was considering this matter. There was no public hearing; there was no opportunity for our community to register their perspective.

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There are over fifty thousand Japanese in New York, many with children currently enrolled in New York schools. I am profoundly concerned that such a charged, sensitive policy decision was made without an opportunity for community discussion. Issuing such significant policy guidance unilaterally sends a strong message to Japanese parents that their perspective is not valued.

We would appreciate it if we could meet you in person to directly voice our position and the concerns of our community. I understand that education sometimes involves controversy, but the United States is a multicultural society with many different communities. Before taking action on an issue of sensitivity to a particular community, it seems to me that the Department should at least offer that community a chance to have their voices heard.

Sincerely,

Koji ABE

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DEPUTY CHIEF OF MISSION, CONSULATE-GENERAL OF JAPAN IN NEW YORK